

Message

From: Orrick, Greg [Orrick.Greg@epa.gov]
Sent: 3/28/2022 9:03:11 PM
To: Sankula, Sujatha [Sankula.Sujatha@epa.gov]; Farruggia, Frank [Farruggia.Frank@epa.gov]; Khan, Faruque [Khan.Faruque@epa.gov]
Subject: RE: PFAS and broflanilide

I skimmed through the MoA posters and found the same two registered pesticides that qualify as PFAS: broflanilide and pyrifluquinazon (PQZ). Note that PQZ is not PZP (i.e., a type of porcine glycoproteins).

Trifluralin, benfluralin, fipronil, etc. are examples of dozens of registered a.i.s that have a -CF₃ group. These don't qualify.

The posters also have flupoxam, sulfluramid, and flubendiamide that qualify as PFAS. But these compounds are not registered for use in the U.S. Flupoxam never was. And sulfluramid and flubendiamide were cancelled in 2013 and 2016, respectively.

Interestingly, tetraconazole, novaluron, and lufenuron are disqualified by only 1 H (where R'' equals a H but R and R' do not).

From: Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Sent: Monday, March 28, 2022 4:23 PM
To: Farruggia, Frank <Farruggia.Frank@epa.gov>; Khan, Faruque <Khan.Faruque@epa.gov>
Cc: Orrick, Greg <Orrick.Greg@epa.gov>
Subject: RE: PFAS and broflanilide

I heard only 2 across the division, broflan and PZP.

From: Farruggia, Frank <Farruggia.Frank@epa.gov>
Sent: Monday, March 28, 2022 4:21 PM
To: Khan, Faruque <Khan.Faruque@epa.gov>
Cc: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>
Subject: RE: PFAS and broflanilide

Given this description (which I don't understand at this point) how many other EFED chemicals fall into this category?

Are trifluralin or benfluralin tossed in too?

From: Khan, Faruque <Khan.Faruque@epa.gov>
Sent: Monday, March 28, 2022 4:10 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>
Subject: RE: PFAS and broflanilide

Thank you Kerry for your prompt response and confirming our initial thought. Faruque

From: Leifer, Kerry <Leifer.Kerry@epa.gov>

Sent: Monday, March 28, 2022 4:02 PM

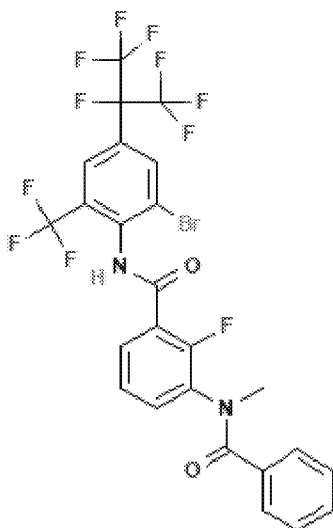
To: Khan, Faruque <Khan.Faruque@epa.gov>

Cc: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>

Subject: RE: PFAS and broflanilide

Hi Faruque,

The definition that we (OPP) are using is the OPPT PFAS working definition for TSCA purposes (**CF₂R-CFR'R''** where **R, R', R'' do not equal H**). Broflanilide *does* meet this definition of a PFAS as it contains a CF₃-CF(R)-CF₃ moiety (see structure below).



Hope this helps, please let me know if you have any questions

Kerry Leifer, Chief (he/him)

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From: Khan, Faruque <Khan.Faruque@epa.gov>

Sent: Monday, March 28, 2022 3:47 PM

To: Leifer, Kerry <Leifer.Kerry@epa.gov>

Cc: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>

Subject: PFAS and broflanilide

Hi Kerry,

Good afternoon. We are planning to meet with RD folks regarding PFAS future briefing related to PQZ and broflanilide next week. I am working on broflanilide in the EFED. I was told that you may have information related PFAS related pesticides. We are interested in finding whether broflanilide is classified as PFAS.

I would appreciate if you have any relevant info related to broflanilide and PFAS to share with us.

Thank you in advance for your help!

Faruque

Faruque Khan, Ph.D.

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